

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

ALFRED TRENKLER,

Defendant.

No. 92-cr-10369-RWZ

**ASSENTED-TO MOTION FOR PARTIAL LIFTING OF SEAL**

The government respectfully moves for a partial lifting of the seal as to medical records of defendant Alfred Trenkler. In further support of this motion, the government states as follows:

1. Defendant Trenkler filed an emergency motion for compassionate release under 18 U.S.C. § 3582(c)(1)(A) on January 15, 2021. In support of that motion, Trenkler filed eleven exhibits along with his memorandum in support. *See* Dkt. 744. Among those exhibits was Exhibit 4, which contains Trenkler's Banner Health medical records, and Exhibit 6, which is a declaration of a retained expert, Dr. Morgan C. Esperance, concerning Trenkler's vulnerability to COVID-19. The Court allowed Trenkler's motion to seal Exhibit 4 on January 15, 2021. *See* Dkt. 748.

2. The government desires to consult with its own expert witness to advise it regarding Trenkler's heart condition and vulnerability to COVID-19. The government requests a partial lifting of the seal on Exhibit 4 such that it can share Exhibit 4 with a medical professional retained to advise the government regarding Trenkler's heart condition and vulnerability to COVID-19. The government will advise the medical professional of the Court's Sealing Order (Dkt. 748) and the Court's Order on this motion.

3. The government also intends to share Trenkler's medical records maintained by the Bureau of Prisons for the period January 1, 2019 to the present with the medical professional. The government has already provided these records to Trenkler's counsel.

4. Counsel for Trenkler assents to this motion.

WHEREFORE, the government respectfully requests a partial lifting of the seal on Exhibit 4, Trenkler's Banner Health Records.

Respectfully submitted,

ANDREW E. LELLING  
United States Attorney

By: /s/ Kristen A. Kearney  
ROBERT E. RICHARDSON  
KRISTEN A. KEARNEY  
Assistant United States Attorneys

#### **CERTIFICATION PURSUANT TO LOCAL RULES 7.1 AND 112.1**

I hereby certify that I have conferred with counsel for defendant Albert Trenkler, and counsel assents to this motion.

Dated: January 20, 2021

/s/ Kristen A. Kearney  
Kristen A. Kearney

#### **CERTIFICATE OF SERVICE**

I hereby certify that this document, filed through the ECF system, will be served on all registered participants listed in the Notice of Electronic Filing (NEF).

Dated: January 20, 2021

/s/ Kristen A. Kearney  
Kristen A. Kearney